

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

In re:  
JIN SUK KIM  
Debtor

Case No. 10-18008-PM  
Chapter 11

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION

Movant,

v.

JIN SUK KIM

Respondent.

**OBJECTION TO MOTION FOR RELIEF FROM STAY**

Jin Suk Kim, by its undersigned counsel, objects to the motion for relief from automatic stay for the following reasons:

1. This Court has jurisdiction to consider and determine this motion pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
2. On July 2, 2010, the movant filed a motion for relief from automatic stay for the property known as 3401 Oakfield Avenue, Baltimore, Maryland,
3. The property does not produce income currently.
4. The debtor is in process of obtaining finances to fund the renovation of the property.

5. Debtor is working with investment groups and lenders to obtain money to partially pay the mortgage on all properties and also to repair/renovate empty units.
6. Debtor requires at least 60 days to obtain investments into the properties.
7. Upon renovation of the empty unit, debtor is confident that her properties would be leased to full capacity through Section 8 program.
8. Relief from stay at this time would cause the debtor to convert to Chapter 7 thereby eliminating any possibility to pay the creditors.
9. After 60 days, the debtor would agree to remove the property from stay.

Wherefore, the debtor by counsel, requests the honorable Court to deny the motion for relief from stay by the movant.

By: /s/ John Shin  
Of Counsel

John Shin, Esquire  
Shin Law Group  
7702 Leesburg Pike, T400  
Falls Church, VA 22043  
571-405-6540  
571-405-6543 fax  
Counsel for Debtor

**Certificate of Service**

I hereby certify that on this 19<sup>th</sup> of July 2010, a copy of the foregoing Objection of the Debtor was served electronically through the CM/ECF system on all parties on the Mail Notice List for this case and by first class mail postage prepaid.

/s/ John Shin

Jordan B. Segal, Esq.  
MORRIS/HARDWICK/SCHNEIDER  
9409 Philadelphia Rd.  
Baltimore, Maryland 21237  
410-284-9600

W. Clarkson McDow, Jr.  
Office of the U.S. Trustee  
6305 Ivy Lane, Ste 600  
Greenbelt, MD 20770  
301-344-8110  
301-344-8431